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6  
7 *Attorney for Victor Vazquez*

8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10  
11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 PIERRE FRANCO-RAMOS and VICTOR  
VAZQUEZ,

15 Defendants.

Case No.: 2:15-cr-00286-RFB-VCF

**STIPULATION TO CONTINUE  
SENTENCING**

*(Second Request)*

16  
17 IT IS HEREBY STIPULATED AND AGREED by and between Nicholas A. Trutanich,  
18 United States Attorney, and Daniel R. Schiess, Assistant United States Attorney, counsel for  
19 the United States of America, Todd M. Leventhal, Esq., counsel for Victor Vazquez, and Craig  
20 Mueller, Esq., counsel for Pierre Franco- Ramos, that the Sentencing currently scheduled for  
21 October 31, 2019 at 3:00 p.m. be vacated and set to a date and time convenient to this Court.

22  
23  
24 The Stipulation is entered into for the following reasons:

25 //  
26

1           1.     Attorney Todd Leventhal will be out of Jurisdiction the following days: 10/31/19  
2     – 11/4/19

3           2.     The additional time requested herein is not sought for purposes of delay, but  
4     merely to allow counsel for Defendant Victor Vazquez to timely appear at the hearing.

5           3.     The defendant is not incarcerated and does not object to the continuance.

6           4.     The parties agree to the continuance.

7  
8           This is the second stipulation to continue Sentencing.

9  
10          DATED: October 30, 2019

11                /s/ Todd M. Leventhal  
12     By \_\_\_\_\_  
13     TODD M. LEVENTHAL  
14     Counsel for: Victor Vazquez

                  /s/ Daniel R. Schiess  
By \_\_\_\_\_  
DANIEL R. SCHIESS  
Assistant United States Attorney

14                /s/ Craig Mueller  
15     By \_\_\_\_\_  
16     CRAIG MUELLER  
17     Counsel for: Pierre Franco-Ramos

1 UNITED STATES DISTRICT COURT  
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,  
4 Plaintiff,

5 v.

6 PIERRE FRANCO-RAMOS and VICTOR  
7 VAZQUEZ

8 Defendants.

Case No.: 2:15-cr-00286-RFB-VCF

**FINDINGS OF FACT, CONCLUSIONS  
OF LAW AND ORDER**

9  
10 **FINDINGS OF FACT**

11 Based on the pending stipulation of counsel, and good cause appearing therefore, the  
12 Court finds that:

- 13 1. Attorney Todd Leventhal will be out of Jurisdiction the following days: 10/31/19  
14 – 11/4/19
- 15 2. The additional time requested herein is not sought for purposes of delay, but  
16 merely to allow counsel for Defendant Victor Vazquez to timely appear at the hearing.
- 17 3. The defendant is not incarcerated and does not object to the continuance.
- 18 4. The parties agree to the continuance.

19 **ORDER**

20 IT IS ORDERED that the sentencing currently scheduled for October 31, 2019, at the  
21 hour of 3:00 p.m., be vacated and continued to \_\_\_\_\_ at the hour of \_\_\_\_:\_\_\_\_.m.

22 DATED this \_\_\_\_\_ day of \_\_\_\_\_, 2019.

23  
24 \_\_\_\_\_  
25 UNITED STATES DISTRICT JUDGE

1 **TODD M. LEVENTHAL, ESQ.**  
Nevada Bar No. 8543  
2 California Bar No. 223577  
3 **LEVENTHAL & ASSOCIATES, PLLC.**  
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6  
7 *Attorney for Victor Vazquez*

8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10  
11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 PIERRE FRANCO-RAMOS and VICTOR  
VAZQUEZ,

15 Defendants.

Case No.: 2:15-cr-00286-RFB-VCF

**STIPULATION TO CONTINUE  
SENTENCING**

*(Second Request)*

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17 IT IS HEREBY STIPULATED AND AGREED by and between Nicholas A. Trutanich,  
18 United States Attorney, and Daniel R. Schiess, Assistant United States Attorney, counsel for  
19 the United States of America, Todd M. Leventhal, Esq., counsel for Victor Vazquez, and Craig  
20 Mueller, Esq., counsel for Pierre Franco- Ramos, that the Sentencing currently scheduled for  
21 October 31, 2019 at 3:00 p.m. be vacated and set to a date and time convenient to this Court.

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24 The Stipulation is entered into for the following reasons:

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1. Attorney Todd Leventhal will be out of Jurisdiction the following days: 10/31/19 – 11/4/19

2. The additional time requested herein is not sought for purposes of delay, but merely to allow counsel for Defendant Victor Vazquez to timely appear at the hearing.

3. The defendant is not incarcerated and does not object to the continuance.


4. The parties agree to the continuance.

This is the second stipulation to continue Sentencing.

DATED: October 30, 2019

*/s/ Todd M. Leventhal*  
By \_\_\_\_\_  
TODD M. LEVENTHAL  
Counsel for: Victor Vazquez

*/s/ Daniel R. Schiess*  
By \_\_\_\_\_  
DANIEL R. SCHIESS  
Assistant United States Attorney

  
*/s/ Craig Mueller*  
By \_\_\_\_\_  
CRAIG MUELLER  
Counsel for: Pierre Franco-Ramos

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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

PIERRE FRANCO-RAMOS and VICTOR  
VAZQUEZ

Defendants.

Case No.: 2:15-cr-00286-RFB-VCF

**FINDINGS OF FACT, CONCLUSIONS  
OF LAW AND ORDER**

**FINDINGS OF FACT**

Based on the pending stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. Attorney Todd Leventhal will be out of Jurisdiction the following days: 10/31/19 – 11/4/19
2. The additional time requested herein is not sought for purposes of delay, but merely to allow counsel for Defendant Victor Vazquez to timely appear at the hearing.
3. The defendant is not incarcerated and does not object to the continuance.
4. The parties agree to the continuance.

**ORDER**

IT IS ORDERED that the sentencing currently scheduled for October 31, 2019, at the hour of 3:00 p.m., be vacated and continued to November 13, 2019 at the hour of 3:30 p.m.

DATED this 30th day of October, 2019.



RICHARD F. BOULWARE, II  
UNITED STATES DISTRICT JUDGE